

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RONALD J. MIGYANKO., individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

THE TJX COMPANIES, INC.,

Defendant.

Civil Action No. 2:20-cv-00077-MJH

JOINT MOTION TO STAY PROCEEDINGS

Counsel for Plaintiff, Ronald J. Migyanko (“Plaintiff”), and counsel for Defendant, The TJX Companies, Inc. (“TJX”), hereby jointly move this Court, for good cause shown, to stay proceedings for sixty days. The stay is necessary because all of the stores at issue in this case have been closed due to the COVID-1 pandemic with no reopening date and no investigation into the alleged aisle barriers can take place while the stores are closed. In addition, the parties will use this time to continue discussing resolution of this lawsuit.

1. As background, Plaintiff filed his Complaint on January 16 2020, alleging violations of Title III of the Americans with Disabilities Act, seeking declaratory and injunctive relief, attorneys’ fees, expenses and costs.

2. On March 12, 2020, the parties stipulated that TJX’s time to answer, move or otherwise respond to Plaintiff’s Complaint was extended to April 22, 2020. The Court granted this request on March 13, 2020. (ECF No. 8.)

3. The parties are available to convene with the Court via telephone, if the Court desires, to help inform its decision regarding this request for a stay.

Date: April 16, 2020

By: /s/Minh N. Vu

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Admitted *pro hac vice*

Counsel for Defendant

Date: April 16, 2020

By: /s/R. Bruce Carlson

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2020, I electronically filed the foregoing document with the Clerk of Court for the United States District Court for the Western District of Pennsylvania using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Minh N. Vu

Minh N. Vu